

EXHIBIT D

To: litwxd@sina.com[litwxd@sina.com]; 'vincent'[vincent@lkmotion.com]; 'lianjia8123'[lianjia8123@sina.com]; '842460194'[842460194@qq.com]; 'ly'[ly@hh-medic.com]; 'zzlangk'[zzlangk@icloud.com]; 'wuxichun'[wuxichun@zhsr-capital.com]; '???'_guolingyun'[guolingyun@nq.com]
Cc: Schechtman, Caryn G.[caryn.schechtman@us.dlapiper.com]; Kantrowitz, Jack[jack.kantrowitz@us.dlapiper.com]; Silverman, Marc[Marc.Silverman@us.dlapiper.com]
From: Chang, Jason[/O=PIPER & MARBURY/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CHANG, JASON2CE]
Sent: Fri 1/18/2019 10:03:56 PM Coordinated Universal Time
Subject: RE: Link Motion: Opposition to OSC / 诉讼

PRIVILEGED & CONFIDENTIAL

Dear Vincent Shi and Board of Directors:

尊敬的史文勇先生以及董事会:

We have not heard back from you on the below. As a result, if we do not hear back from you within 24 hours, DLA will assume that we have Link Motion's consent not to oppose the motion. As explained below, we reiterate that if Link Motion does not respond, the motion may be granted, which may include such relief as appointing a receiver over the company and a preliminary injunction restricting the Company from transferring assets, attorneys' fees and costs, and other such relief that the Court may deem appropriate. It may also include relief as to Plaintiff's request for an order requiring the Defendants restore all assets transferred to third parties within the past ninety days. It may include other relief as well.

我们没有收到您关于以下邮件的任何回复。因此，如果我们在24小时内仍未收到您的回复，DLA Piper将假定本所已经获得凌动智行（link Motion, inc）的同意不就该申请提出异议。如此前解释，我们重申，如果凌动智行（link Motion, inc）不予回应，该申请可能会被许可，包括以下救济：指定公司接收人以及发布初步禁令，以限制公司转移资产、律师费和其他费用等法院认为适当的其他此类救济。救济也可能包括，依据原告提出的请求发出命令，要求被告恢复过去九十天内转让第三方的所有资产。也可能包括其他救济。

Further, if we do not hear back from you within 24 hours, we will also assume that we have Link Motion's consent to withdraw from representation. In that event, we will file a letter with the Court that states:

此外，如果我们在24小时内没有收到您的回复，我们将会假定本所已获得凌动智行（Link Motion, inc）的同意退出代理。在这种情况下，我们将向法院提交一封信，其中说明：

Dear Hon. Marrero:

尊敬的Marrero法官，

We write to inform you that Defendant Link Motion Inc. ("Link Motion") will not submit an opposition to Plaintiff Wayne Baliga's motion for a preliminary injunction and appointment of a temporary receiver.

Additionally, if the Court requires, DLA Piper will be seeking leave to withdraw from this matter.

我们写信通知您，被告凌动智行（Link Motion, Inc）不会对原告Wayne Baliga请求临时限制、初步禁令以及指定临时接收人提出异议。此外，如果法院要求，DLA Piper将请求不再代理及退出本案。

Thank you,

谢谢

If you disagree with any of the above, please respond within 24 hours. If you do not, we will assume we have your consent to not oppose the motion and to withdraw from representation if the Court requires.

如果您不同意上述任何事项，请在24小时内回复。如果您没有，我们将假定本所已经获得您同意不对该申请提出异议，并在法院要求时退出代理。

Jason Chang

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From: Chang, Jason

Sent: Monday, January 14, 2019 9:36 PM

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Cc: Schechtman, Caryn G. <caryn.schechtman@dlapiper.com>; Kantrowitz, Jack <Jack.Kantrowitz@dlapiper.com>; Silverman, Marc <Marc.Silverman@dlapiper.com>

Subject: Link Motion: Opposition to OSC / 诉讼

Dear Vincent Shi and Board of Directors:

史文勇先生以及董事会:

On December 14, 2018, Plaintiff Wayne Baliga filed an Order to Show Cause for Temporary Restraints, for a Preliminary Injunction, and for the appointment of a Temporary Receiver against Defendant Link Motion, Inc., Vincent Wenyong Shi, Jia Lian, and Xiao Yu ("Defendants"). Plaintiff claims that relief is required because Defendants have allegedly: (1) failed to take steps to prevent Link Motion's involuntary delisting from NYSE; (2) directed or allowed Link Motion to abandon certain business lines, including ceasing communications with a subsidiary in Finland and Texas, and operating entities in China; and, (3) wrongfully transferred ownership interests of Link Motion's assets in Showself, SyberOS and Rideshare businesses to unknown third parties, without the consent or knowledge of the Board or shareholders.

2018年12月14日, 原告Wayne Baliga针对被告凌动智行(Link Motion, Inc.)、史文勇, Jia Lian和Xiao Yu, 向法院申请就临时限制, 初步禁令以及临时接收人的指定发出陈述理由令。原告主张其需要救济, 因被告涉嫌:

(1) 未采取措施, 以避免凌动智行被从纽交所强制摘牌; (2) 指挥或许可凌动智行放弃特定业务线, 包括中止与芬兰和德克萨斯州子公司的沟通, 以及与中国运营实体的沟通; 及 (3) 未经董事会或股东同意或知悉, 将凌动智行在秀色与元心科技的资产所有权权益以及网约车业务非法转让至未知的第三方。

On December 14, 2018, the Court entered an order to temporarily restrain and enjoin Defendants from "transferring, liquidating, dissipating, assigning, and/or granting a lien or security interest or other interest in, any assets belonging to Link Motion" (the "TRO"). Following the issuance of the TRO, the parties agreed to extend the TRO pending the Court's determination of the Plaintiff's motion for preliminary injunction and a temporary receiver.

2018年12月14日, 法庭发布命令, 临时限制和禁止被告“转让、变卖、分散, 分派凌动智行所有的任何资产和/或提供凌动智行所有的任何资产的扣押权, 担保物权或其他权益”(“临时限制令”)。临时限制令发出后, 各方同意延长临时限制令期限, 延长时间取决于法庭就原告申请初步禁令与临时接收人作出的裁定。

Defendants opposition to Plaintiff's motion is due next Monday, January 21, 2019. To oppose the motion, we should get an affidavit or other evidence from Defendants that explains the business or financial reasons for the transfers and abandonment of business. Also, we need to understand what is going on with NYSE delisting, and whether the Company will be getting relisted, or the Company's reasons for not filing forms on time.

被告对原告申请的异议截止至下周一, 2019年1月21日。为抗辩该申请, 我们应从被告取得一份书面证词或其他证明, 以解释相关业务或转让与放弃相关业务的财务原因。同时, 我们需了解目前纽交所摘牌的具体情形, 以及公司是否会重新上市, 或公司未按时提交申报表的原因。

If we do nothing, the motion may be granted, which may include such relief as appointing a receiver over the company and a preliminary injunction restricting the Company from transferring assets. It may also include relief as to Plaintiff's

request for an order requiring the Defendants restore all assets transferred to third parties within the past ninety days.

如果我们什么都不做，法庭可能会同意上述请求，包括以下救济：指定公司接收人以及发布初步禁令，以限制公司转让资产。也可能包括，依据原告请求发出命令，要求被告恢复过去九十天内已经转让给第三方的所有资产。

We have repeatedly asked for instruction on how to proceed but have not received any guidance from the Company or the individual defendants and advised that if we do not receive payment for legal services, we cannot take on this litigation matter. Attached is the Plaintiff's motion and complaint, and the TRO for reference.

关于如何处理，我们已多次向您寻求指示，但未收到公司或任何个人被告的任何指示。我们也多次告知，如不收律师服务费，我们将不能继续办理此诉讼案件。随附为原告请求，诉状以及临时限制令，供您参阅。

Thank you.

谢谢。

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